# ST MALACHY’S COLLEGE

# PRIVACY NOTICE

# For Alumni & Donors

**ABOUT US**

St Malachy’s College is the data controller of the personal information we hold about our alumni and donors. This means that we are responsible for deciding how we hold and use the personal information which we collect.

We are required under the General Data Protection Regulation (GDPR) to notify you of the information contained in this privacy notice.

This notice applies to alumni and donors. We may update this notice at any time but if we do so, we will inform you as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the GDPR.

If you have any questions about this privacy notice or how we handle personal information, please contact the Principal who will deal with your query. The Principal can be contacted either by email at correspondent@stmalachys.belfast.ni.sch.uk by post at St Malachy’s College, 36 Antrim Road, Belfast, BT15 2AE or by telephone on 02890 748285.

Our Data Protection Officer is the Education Authority and it monitors the school’s data protection procedures to ensure they meet the standards and requirements of the GDPR. Please contact Data Protection Officer at Education Authority, 40 Academy Street, Belfast, BT1 2NQ, by email at dpo@eani.org.uk or by telephone on 028 82411300. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO’s details are as follows:

**The Information Commissioner’s Office – Northern Ireland**3rd Floor
14 Cromac Place,
Belfast
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114
Email: ni@ico.org.uk

**HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?**

We collect some personal information about our alumni and donors through the alumni database portal on our alumni website. We also collect such information from emails or completed data collection sheets.

**WHAT PERSONAL INFORMATION DO WE COLLECT, STORE AND USE ABOUT OUR ALUMNI AND DONORS?**

Personal information is information that identifies you and relates to you. We will collect, store and use the following categories of personal information about our alumni and donors:

* Personal information (such as name, age, date of birth and photographs)
* Contact information (such as address and telephone number)
* Biographical information
* Your education history
* Your clubs and societies affiliations and other connections with the College
* Your professional activities and employment
* Your interests
* Information you have publicly shared on social media
* Your volunteering activity for the College
* Your relationships with other College alumni, donors and friends
* Your donation history
* Records of communication and interactions with you
* Your attendance at College events

## WHY DO WE COLLECT, STORE AND USE THIS INFORMATION?

We will only use personal information when the law allows us to.

We will use your data to administer a range of activities for our alumni, friends and supporters and ensure that the ways in which we communicate with you, such as sending out news about the College, inviting you to events, or advising you of fundraising activities and plans/campaigns, are relevant and adhere to your chosen communication preferences.

To fundraise effectively, the College undertakes in-house research to help identify individuals who may be able to provide support. This information may come from any publicly available resources. From time to time, it may be necessary to engage the services of an external organisation to assist us in analysing our data and, in particular, where we would like to assess the feasibility of a planned campaign or project. We may use automated or manual processes such as wealth screening to analyse and segment our data. On occasion we may use trusted third parties to carry out this analysis. You will always have the right to opt out of any of this processing, and you can do so by emailing correspondent@stmalachys.belfast.ni.sch.uk

Depending on your privacy settings and interaction with us on social media sites like Facebook, LinkedIn and Twitter, we may cross-check your data to ensure that it is robust and up to date.

We may use photographs or videos of you for the College or Alumni websites or prospectus to promote the College. You will always have the right to opt out of this, and you can do so by emailing correspondent@stmalachys.belfast.ni.sch.uk

We keep personal information electronically on the School’s information management systems, the School’s IT network, or manually in indexed filing systems.

**CONSENT**

The College hopes that its relationship with alumni and donors will be lifelong. We will try to ensure that the data we hold for you is up to date, reasonable and not excessive. You always have the right to:

* be informed as to how we use your data (via this privacy notice);
* access or request a copy of the data we hold about you;
* update your data and/or manage your communication preferences by contacting the College;
* opt out of specific types of processing;
* ask us to remove your data from our records;
* withdraw consent, where it is used as a legal basis for processing.

If you are an alumnus of the College and exercise your right to be removed from our database, we will maintain some core data (name, date of birth, years of attendance) for archive purposes and to ensure we do not contact you inadvertently in the future. If you are a donor we may also need to retain some financial records for the period of time required for statutory purposes.

**HOW LONG IS THE INFORMATION STORED FOR?**

We will only keep personal information for as long as necessary to fulfil the purposes we collected it and including for the purposes of satisfying any legal, accounting, or reporting requirements. The College is committed to holding your data securely and treating it with sensitivity. As we would like to develop a longstanding relationship with you we will hold your information for up to 80 years. You will always have a right to ask for it to be destroyed.

In determining the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

**DATA SECURITY**

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator (currently the Information Commissioner’s Office) of a suspected breach where we are legally required to do so.

## WHO WE SHARE INFORMATION WITH

We may have to share data with third parties, including third-party service providers and other bodies such as:

* The Board of Governors
* C2K School Management Information System
* From time to time, it may be necessary to engage the services of an external organisation to assist us in analysing our data and, in particular, where we would like to assess the feasibility of a planned campaign or project. On occasion we may use trusted third parties to carry out this analysis.

## WHY WE SHARE INFORMATION

We do not share information with anyone without consent unless the law and our policies allow us to do so. We only permit access to personal data for specified purpose and in accordance with our instructions.

**YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

Under GDPR, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Principal by email at correspondent@stmalachys.belfast.ni.sch.uk by post at St Malachy’s College, 36 Antrim Road, Belfast, BT15 2AE and by telephone on 02890 748285.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You have the right to:

* **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
* **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold corrected.
* **Request erasure** of personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* **Object to processing** of personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

***Complaints***

*If you have a complaint about the manner in which any of your personal information has been used or about how any request in respect of your information has been dealt with, you can contact the Principal. You can make a complaint in writing, by email, by telephone or in person. All complaints will be investigated in accordance with our complaints policy and in accordance with our obligations under the GDPR.*

*You also have the right to make a complaint, at any time, to the Information Commissioner’s Office, the UK supervisory authority for data protection issues, through their website* [*www.ico.org.uk*](http://www.ico.org.uk)*. The ICO’s details are as follows:*

***The Information Commissioner’s Office – Northern Ireland***

*3rd Floor*

*14 Cromac Place*

*Belfast*

*BT7 2JB*